

FILED - GR

August 7, 2013 10:08 AM

TRACEY CORDES, CLERK

U.S. DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

BY: [initials]

SCANNED BY: [initials]

In the United States District Court  
For the Western District of MichiganBradley Keith Sleighter

(Enter above the full names of all plaintiffs, including prisoner number, in this action.)

v.

Captain Randy Demory

(Enter above the full name of the defendant or defendants in this action.)

1:13-cv-847

Paul L. Maloney - Chief U.S. District Judge  
Joseph G. Scoville - U.S. Magistrate JudgeCOMPLAINT

## I. Previous Lawsuits

**CAUTION: The Prison Litigation Reform Act has resulted in substantial changes in the ability of incarcerated individuals to initiate lawsuits in this and other federal courts without prepayment of the required \$350 filing fee. Accurate and complete responses are required concerning your litigation history. Generally, a plaintiff's failure to accurately and completely answer the questions set forth below will result in denial of the privilege of proceeding *in forma pauperis* and require you to pay the entire \$350 filing fee regardless whether your complaint is dismissed.**

- A. Have you ever filed a lawsuit while incarcerated or detained in any prison or jail facility? Yes ☒ No ☐
- B. If your answer to question A was yes, for each lawsuit you have filed you must answer questions 1 through 5 below. Attach additional sheets as necessary to answer questions 1 through 5 below with regard to each lawsuit.

1. Identify the court in which the lawsuit was filed. If it was a state court, identify the county in which the suit was filed. If the lawsuit was filed in federal court, identify the district within which the lawsuit was filed.

U.S. District Court for the Western District of Michigan

2. Is the action still pending? Yes ☒ No ☐

a. If your answer was no, state precisely how the action was resolved: \_\_\_\_\_

3. Did you appeal the decision? Yes ☐ No ☐

4. Is the appeal still pending? Yes ☐ No ☐

a. If not pending, what was the decision on appeal? \_\_\_\_\_

5. Was the previous lawsuit based upon the same or similar facts asserted in this lawsuit? Yes ☐ No ☒

If so, explain: \_\_\_\_\_

II. Place of Present Confinement Kent County Correctional Facility

If the place of present confinement is not the place you were confined when occurrence that is subject of instant lawsuit arose, also list the place you were confined: \_\_\_\_\_

## III. Parties

## A. Plaintiff(s)

Place your name in the first blank and your present address in the second blank. Provide the same information for any additional plaintiffs. Attach extra sheets as necessary.

Name of Plaintiff Bradley Keith Sleighter  
 Address 703 Ball Ave. N.E. Grand Rapids, MI 49503

## B. Defendant(s)

Complete the information requested below for each defendant in this action, including whether you are suing each defendant in an official and/or personal capacity. If there are more than four defendants, provide the same information for each additional defendant. Attach extra sheets as necessary.

Name of Defendant #1 Captain Randy Demory  
 Position or Title Captain at Kent County Jail  
 Place of Employment Kent County Jail Administration  
 Address 701 Ball Ave NE Grand Rapids, MI 49503  
 Official and/or personal capacity? Both Official and Personal Capacity

Name of Defendant #2 \_\_\_\_\_

Position or Title \_\_\_\_\_

Place of Employment \_\_\_\_\_

Address \_\_\_\_\_

Official and/or personal capacity? \_\_\_\_\_

Name of Defendant #3 \_\_\_\_\_

Position or Title \_\_\_\_\_

Place of Employment \_\_\_\_\_

Address \_\_\_\_\_

Official and/or personal capacity? \_\_\_\_\_

Name of Defendant #4 \_\_\_\_\_

Position or Title \_\_\_\_\_

Place of Employment \_\_\_\_\_

Address \_\_\_\_\_

Official and/or personal capacity? \_\_\_\_\_

Name of Defendant #5 \_\_\_\_\_

Position or Title \_\_\_\_\_

Place of Employment \_\_\_\_\_

Address \_\_\_\_\_

Official and/or personal capacity? \_\_\_\_\_

## IV. Statement of Claim

State here the facts of your case. Describe how each defendant is personally involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets if necessary.

Plaintiff currently has 4 42 USC-1983 complaints filed against the Kent County Jail Administration; Case Numbers 1:12-cr-910, 1:12-cv-1008, 1:12-cv-763 and case no. 1:13-cv-697, which was just filed 6-27-2013. Captain Randy Demory is in an Administrative position at the Kent County Jail and is specifically named as a Defendant in 2 of these complaints; as he is the head policy/rule maker and enforcer of these at the jail. Plaintiff was placed in "Administrative Segregation" in an isolation cell separated from the general inmate population on August 6, 2013. Plaintiff was told that this action is not punitive but per Captain Randy Demory. Plaintiff was further informed that inmates are put into "Administrative Segregation" for a variety of reasons, including but limited to security issues at the jail. Plaintiff was informed that he had done nothing that would warrant this action under jail policy. Plaintiff was further informed that the guards were following the orders from Capt. Demory. Plaintiff claims that this placement in an isolation cell is to prevent him from assisting other inmates from filing legal complaints against the Jail. Plaintiff claims that if the jail had a valid grievance procedure he would not have to assist inmates legal actions against the jail. Plaintiff claims that the "actions" by Captain Demory are discriminatory, and retaliatory. This action further violates Plaintiff's right to "free Speech". The jail policy that allows Capt Demory this Autonomy is a violation of his "due process" rights under the law.

**V. Relief**

State briefly and precisely what you want the court to do for you.

Declaratory and/or injunctive relief. Punative  
damages against the Defendant in his Official  
Capacity and/or personal capacity.

I claim "Nominal Damages" apply to this  
violation of Plaintiff's civil right; to allow that  
this violation remains actionable in the  
absence of other relief and to avoid gamesman-  
ship on the part of the Defendant's attorneys.

Aug 6, 2013  
Date

Bradley Keith Fleighter  
Signature of Plaintiff

**NOTICE TO PLAINTIFF(S)**

The failure of a *pro se* litigant to keep the court apprised of an address change may be considered cause for dismissal.